

Qwest Corporation

1600 7th Avenue, Room 3206
Seattle, Washington 98191
(206) 345-1568
Facsimile (206) 343-4040

Mark S. Reynolds

Senior Director – Regulatory Policy and Law



February 25, 2011

Mr. David Danner
Secretary & Executive Director
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
Olympia, WA 98504-7250

Dear Mr. Danner:

Attached are the February payments for the Washington Performance Assurance Plan (PAP) based on December 2010 performance.

We reran the months Sep-Dec 2010 to include PIDs for the Unbundled Asynchronous Digital Subscriber Line (ADSL) product in the PAP. This led to incremental payments of \$1,200 in Tier 2.

Although we are making these payments for ADSL we believe they may not be warranted because of several issues affecting this product, including the apparent obsolescence of the retail comparative. This has resulted in payments being triggered in situations where the CLEC performance is good or even excellent by any standard and microscopic differences are being unfairly translated into large payments.

Qwest is considering several options to deal with this issue, including possibly requesting a waiver of payment obligations under section 13.3 of the Washington PAP for this product and the affected measurements.

Please let me know if you have any questions about this information.

Sincerely,

A handwritten signature in black ink that reads "Wayne Koberwing". The signature is written in a cursive, slightly slanted style.

For Mark S. Reynolds
Attachment

WASHINGTON PAP SUMMARY - DECEMBER 2010

State	Reporting Period	PID	PID Description	Product	Current Month Tier 1 Payment	Current Month Tier 2 Payment	Current Month Special Fund Payment	Current Month Total Payment	Incremental Rerun Tier 1 Payment	Incremental Rerun Tier 2 Payment	Incremental Rerun Special Fund Payment	Incremental Rerun Total Payment	Tier 1 Interest	Tier 2 Interest	Total Interest
WA	12/01/2010	Total Payments			9666	6300	0	15966	901	1200	0	2101	4	7	11
WA	12/01/2010	BI-4A	Billing Completeness	UNE_RESAGG	0	0	0	0	0	0	0	0	0	0	0
WA	12/01/2010	MR-6A	Mean Time to Restore	BUS	673	0	0	673	0	0	0	0	0	0	0
WA	12/01/2010	MR-6D	Mean Time to Restore	EEL_DS1	692	0	0	692	0	0	0	0	0	0	0
WA	12/01/2010	MR-8	Trouble Rate	EEL_DS1	4629	0	0	4629	0	0	0	0	0	0	0
WA	12/01/2010	MR-8	Trouble Rate	UBL_ADSL2	866	3600	0	4466	1	1200	0	1201	0	7	7
WA	12/01/2010	MR-8	Trouble Rate	UBL_2W_NL	0	1200	0	1200	0	0	0	0	0	0	0
WA	12/01/2010	MR-8	Trouble Rate	UBL_DS1	985	0	0	985	0	0	0	0	0	0	0
WA	12/01/2010	MR-8	Trouble Rate	UBL_ISDN	810	1500	0	2310	0	0	0	0	0	0	0
WA	12/01/2010	OP-3D	Installation Commitments Met	UBL_ADSL	900	0	0	900	4	0	4
WA	12/01/2010	OP-3D	Installation Commitments Met	UBL_ANAAGG	750	0	0	750	0	0	0	0	0	0	0
WA	12/01/2010	OP-3E	Installation Commitments Met	UBL_ANAAGG	150	0	0	150	0	0	0	0	0	0	0
WA	12/01/2010	OP-4A	Installation Interval	RES	21	0	0	21	0	0	0	0	0	0	0
WA	12/01/2010	OP-4B	Installation Interval	RES	14	0	0	14	0	0	0	0	0	0	0
WA	12/01/2010	OP-6-4	Delayed Days	UBL_XDSL12	75	0	0	75	0	0	0	0	0	0	0
WA	12/01/2010	PO-2B-X	PO-2BX Percent Electronic Flow-through (UBL_AGG	0	0	0	0	0	0	0	0	0	0	0
WA	12/01/2010	PO-6	Work Completion Notification Timeliness	ALL_PROD	1	0	0	1	0	0	0	0	0	0	0